

<p>Attorney or Party Name, Address, Telephone & FAX Numbers, State Bar Number & Email Address</p> <p>Edward Jason Dennis Lynn Pinker Cox & Hurst, LLP 2100 Ross Avenue Suite 2700 Dallas, TX 75201 jdennis@lynnllp.com Admitted Pro Hac Vice</p> <p><input type="checkbox"/> Plaintiff(s) appearing without attorney <input checked="" type="checkbox"/> Attorney for Plaintiff(s)</p>		<p>FOR COURT USE ONLY</p>	
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION</p>			
<p>In re:</p> <p>Channel Technologies Group, LLC</p> <p>Debtor(s).</p>		<p>CASE NUMBER: 9:16-bk-11912-DS ADVERSARY NUMBER: 9:18-ap-01058-DS CHAPTER: 11</p>	
<p>Corporate Recovery Associates, LLC</p> <p>Plaintiff(s),</p> <p>vs.</p> <p>Blue Wolf Capital Partners, LLC, et al.</p> <p>Defendant(s).</p>		<p>PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1</p> <p>DATE: 04/28/2020 TIME: 11:30 am COURTROOM: 201 ADDRESS: 1415 State Street Santa Barbara, CA 93101</p>	

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

1. Name of Defendant(s) against whom default judgment is sought (*specify name*): Pengdi Han
2. Plaintiff filed the complaint in the above-captioned proceeding on (*specify date*): 11/05/2018
3. The Summons and Complaint were served on Defendant by ☒ personal service ☐ mail service
on the following date (*specify date*): 11/08/2018
4. A true and correct copy of the completed return of summons form is attached.

"Bankruptcy Code" and "11 U.S.C." refer to the United States Bankruptcy Code, Title 11 of the United States Code. "FRBP" refers to the Federal Rules of Bankruptcy Procedure. "LBR" and "LBRs" refer to the Local Bankruptcy Rule(s) of this court.

5. The time for filing an answer or other response expired on (*specify date*): 12/07/2018
6. No answer or other response has been filed or served by Defendant.
7. The default of Defendant:
- a. ☐ Has not yet been entered, but is requested
- b. ☒ Was entered on (*specify date*): 10/10/2019
8. **A Status Conference:**
- a. ☒ Is scheduled for (*specify date, time, and place*): April 28, 2020 at 11:30 a.m.
1415 State Street, Courtroom 201, Santa Barbara, CA 93101
- b. ☐ Was held on (*specify date, time, and place*): _____
9. As proof that Plaintiff is entitled to the relief requested in the complaint, Plaintiff:
- a. ☒ Relies on the complaint and attached documents.
- b. ☒ Attaches the following documents to establish a *prima facie* case:
- (1) ☒ Declaration of (*specify*): Richard Feferman
- (2) ☒ Declaration of (*specify*): Richard Bass
- (3) ☐ Other (*specify*): _____
10. As further support for entry of a default judgment, Plaintiff submits a memorandum of points and authorities (optional).
11. **DECLARATION OF NON-MILITARY STATUS** (Servicemembers Civil Relief Act, 50 U.S.C. chapter 50 (§§ 3901-4043)). The undersigned party or counsel declares under penalty of perjury, with respect to each Defendant against whom a default judgment is sought by this motion:
- a. ☒ Defendant is not currently in military service. The facts that support this statement are as follows (*see the court's website for information about how to verify non-military status*):

See Affidavit of Non-Military Status for Defendant Pengdi Han, Ex. F to Memorandum of Points and Authorities in Support of Plaintiff's Motion for Default Judgment Against Defendants Pengdi Han and DHAN
- b. ☐ Defendant is currently in military service. The facts that support this statement are as follows (*if this box is checked, the plaintiff must attach a supplement to this motion addressing the requirements in 50 U.S.C. § 3931(b)(2) to appoint an attorney for the Defendant before entering a judgment*):
- c. ☐ I am unable to determine whether or not Defendant is in military service. The facts that support this statement are as follows (*if this box is checked, the plaintiff must attach a supplement to this motion addressing the bond requirement in 50 U.S.C. § 3931(b)(3)*):

12. Defaulting party is not an infant or incompetent party.

Plaintiff requests that this court enter a default judgment in favor of Plaintiff. A copy of the lodged proposed default judgment is attached.

Date: 03/31/2020

Respectfully submitted,

Lynn Pinker Cox & Hurst

Printed name of law firm



Signature

Edward Jason Dennis

Name of Attorney for Plaintiff or Plaintiff

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2100 Ross Avenue, Dallas, Texas 75202

A true and correct copy of the foregoing document entitled: **PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 03/31/2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

ttrager@rppmh.com; eje@manningllp.com; steve@kmcllp.com; steinbergh@gtlaw.com;
Chang@Blankrome.com; kbanner@greenbergglusker.com; ilandsberg@sklarkirsh.com;
jboustani@btlaw.com; pbenvenuti@kellerbenvenu; david@taylorstrategic.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL *(state method for each person or entity served)*: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

03/31/2020

Edward Jason Dennis

Date

Printed Name


Signature